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February 7, 2018

VIA ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: Quadlogic Controls Corporation v. Pounce Electronics S.A. de C.V.
Civil Action No.: 18-cv-0400 (ER)**

Dear Judge Ramos:

We represent the Plaintiff in the above-captioned action, and write in response to Defendant's counsel's letter motion of today, seeking a 46 day extension to respond to the Complaint, which was served on January 18, 2018.

Our objection to the requested extension is three-fold:

(1) 46 days is excessive, and the 20 days that we offered seems more reasonable and appropriate.

(2) The conditions for the extension seem reasonable and customary, as (i) Defendant should have no reluctance to agree not to assert any objection to jurisdiction, particularly since the subject contract provides that the parties agree to jurisdiction in New York and before this Court; and (ii) the extension should not be used as part of a tactic to commence litigation in another jurisdiction.

(3) The excuses proffered by counsel for the extension are insufficient given that counsel has refused to identify when his firm received the Complaint in this action, and we believe that the excuse about his ability to communicate with his client is not credible given the proficiency of Defendant's representative in the English language.

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Under these circumstances, we believe that a 20 day extension with the customary conditions requested is reasonable, and that Defendant's request should not be granted.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'David Sack', with a long horizontal flourish extending to the right.

David Sack

cc: Brian A. Katz, Esq. (via ECF)